

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: JOEL GRICE, { CHAPTER 13
{
{ DEBTOR(S) { CASE NO. A14-66553-BEM
{
{ JUDGE ELLIS-MONRO

OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. The Plan as proposed will extend beyond sixty (60) months, contrary to 11 U.S.C. Section 1322(d). (83 months).
3. Pursuant to information received from the Internal Revenue Service, 2013 tax returns have not been provided to the taxing authorities; thereby, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 plan, in violation of 11 U.S.C. Sections 1322(d) and 1325(a)(6).
4. The Chapter 13 budget fails to reflect the Debtor's additional income of \$450.00 per month; thereby preventing the contribution of all disposable income to this plan.
5. The Debtor(s)' plan does not provide for payment of all of the Debtor(s)' disposable income to the Trustee for thirty-six (36) or more months as required by 11 U.S.C. Section 1325(b)(1)(B).
6. The Trustee request a copy of the Debtor's divorce decree and any and all documentation connected and/or related to the Debtor's property settlement agreement.

Mary Ida Townson, Chapter 13 Trustee
Suite 2200 - 191 Peachtree Street, N.E.
Atlanta, GA 30303-1740
(404) 525-1110
sonyab@atlch13tt.com

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

October 15, 2014

/s/
Sonya M. Buckley, Attorney
For Chapter 13 Trustee
GA Bar No. 140987

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CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S) :

JOEL GRICE
3044 WHITE OAKS MEWS
DECATUR, GA 30034

ATTORNEY FOR DEBTOR(S) :

THE LAW OFFICE OF TIFFINI C. BELL, LLC
SUITE 300
201 17TH STREET
ATLANTA, GA 30363

in the foregoing matter with a copy of this pleading by
depositing in the United States Mail a copy of same in a
properly addressed envelope with adequate postage thereon.

This 15th day of October 2014

/s/

Sonya M. Buckley, Attorney
For Chapter 13 Trustee
GA Bar No. 140987

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